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December 8, 2023

BY ECF AND EMAIL

The Honorable Katherine Polk Failla
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: In re Tether and Bitfinex Crypto Asset Litigation, No. 19 Civ. 9236 (S.D.N.Y.)

Dear Judge Failla:

We write on behalf of the B/T Defendants to seek permission to file under seal the B/T Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Leave to Amend, along with the accompanying Declaration and Exhibits (collectively, the "Opposition").

The B/T Defendants' Opposition discusses the Anonymous Trader and his trading strategy in detail, and includes references to the Anonymous Trader's deposition and quotations from his declaration dated September 5, 2020, which was previously filed under seal at Dkt. No. 190. The Opposition also cites extensively from Plaintiffs' Motion for Leave to Amend and Proposed Second Amended Complaint (Dkt. Nos. 480, 480-1), which have been filed under seal. Consistent with the Court's prior Orders regarding the Anonymous Trader's confidentiality (Dkt. Nos. 195, 215, 420, 439), the B/T Defendants intend to confer with the Anonymous Trader regarding redactions to the Opposition and to file a public version promptly thereafter.

Respectfully submitted,

/s/ Elliot Greenfield